

**ABUSE IN CARE ROYAL COMMISSION OF INQUIRY  
MARYLANDS SCHOOL**

**Under** The Inquiries Act 2013

**In the matter of** The Royal Commission of Inquiry into Historical Abuse in State Care and in the Care of Faith-based Institutions

**Royal Commission:** Judge Coral Shaw (Chair)  
Ali'imuamua Sandra Alofivae

**Counsel:** Ms Katherine Anderson, Mr Simon Mount QC, Ms Kerry Beaton QC, Ms Jane Glover, Ms Anne Toohey, Ms Kima Tuiali'i, Ms Julia Spelman, Mr Winston McCarthy, Ms Echo Haronga, Mr Michael Thomas and Ms Kathy Basire for the Royal Commission  
Ms Rachael Schmidt-McCleave, Ms Julia White and Mr Max Clarke-Parker for the Crown  
Ms Sonja Cooper, Ms Amanda Hill, Mr Sam Benton, Ms Alana Thomas and Mr Sam Wimsett as other counsel attending

**Venue:** Level 2  
Abuse in Care Royal Commission of Inquiry  
414 Khyber Pass Road  
AUCKLAND

**Date:** 17 February 2022

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**TRANSCRIPT OF PROCEEDINGS**

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**CLOSING SUBMISSIONS BY ST JOHN OF GOD**

1  
2 **MS McKECHNIE:** To commence, Madam Chair, Commissioner Alofivae, over the past seven  
3 days the Royal Commission has heard evidence from survivors and survivor advocates and  
4 throughout this period there have been members of the Catholic Church here and they have  
5 also been online, thanks to the Covid restrictions, by necessity, and they have been listening  
6 to the experiences of those individuals and reflecting deeply on their oral evidence and their  
7 written submissions.

8 We would like to acknowledge the courage of the men and the women who have  
9 shared their experiences and the experiences of those who have been harmed.  
10 Commissioners, the Brothers and the Church have heard their pain and they have heard the  
11 anger and the frustration.

12 Brother Tim and Archbishop Paul appeared in the hearing and I want to echo their  
13 profound apologies as I commence these closing submissions to all who have been hurt and  
14 harmed while in the care of Marylands and the Hebron Trust. Those two men as  
15 individuals, and the wider church, acknowledges that these places should have been places  
16 of safety and nurture for vulnerable young people and they were not.

17 That Marylands was a place of sexual, physical and psychological abuse,  
18 Commissioners, is horrific. That Bernard McGrath was able to corrupt the Hebron service  
19 intended to assist vulnerable young people is appalling. And the Church apologises to you,  
20 survivors, to your families, whānau and to the hundreds of co-workers who worked in these  
21 institutions. This harm should never have happened and it is a great shame and deep regret  
22 to the church that it has.

23 Commissioners, the extent of the abuse, particularly in Marylands, is painfully  
24 clear. From previous investigations, from the redress process The Order has undertaken  
25 and from the evidence at this hearing, it is clear that the abuse at Marylands was  
26 widespread and caused by many offenders. It is the darkest chapter in the history of the  
27 Catholic Church in New Zealand.

28 The abuse involving St John of God, for which the Brothers have records of  
29 allegations and we acknowledge that that is only a part of the likely offending, accounts for  
30 16% of all the allegations of sexual harm for which the church has records.

31 One man, Bernard McGrath, is responsible for 5% of those allegations.

32 One of the most challenging questions for the Royal Commission, and for society,  
33 will be to determine how this harm was able to go on for so long. To modernise, to our

1 eyes, certainly to yours and to mine, with the extent of this harm being clear, it seems  
2 unfathomable that this was not seen and was not stopped earlier.

3 And Commissioners, there is clearly no simple answer to this question. And I have  
4 set out in my submissions what some of the evidence shows and what some of the historical  
5 record shows about what the barriers may have been.

6 First, Commissioners, there was clearly historical societal attitude towards victims  
7 of abuse, and a belief about complainants and attitudes towards those in positions of  
8 authority. The evidence of these boys, when they were brave enough to make complaints,  
9 was not believed by their families, by Police, by social workers, when they sought to make  
10 complaints.

11 It was an error of great respect for authority figures, and for many in society it was  
12 unthinkable that abuse could be taking place in institutions like this. The Catholic Church  
13 acknowledges, Commissioners, the dangers of clericalism and the role religion played in  
14 reinforcing some of those beliefs about the infallibility of priests and Brothers. And that  
15 evidence was very painful for the Church to hear the survivors give and they acknowledge  
16 that role.

17 There was some evidence, Commissioners, about the lengths that the perpetrators  
18 went to hide their abuse. Evidence from evening staff at Marylands who had suspicions but  
19 did not see offending. And the evidence at Hebron that it appears Bernard McGrath took  
20 great steps to keep his offending secret from others. Indeed, other children genuinely  
21 leaping to his defence, which is awful to think about in retrospect, but demonstrates the  
22 power of manipulation and secrecy.

23 **CHAIR:** To that, I think we have to add the use of violence, the threats of violence should the  
24 children disclose.

25 **MS McKECHNIE:** Yes, ma'am, I'll come to that in paragraph --

26 **CHAIR:** You will come to that, all right.

27 **MS McKECHNIE:** No, ma'am, there are sadly many factors and that is one of them, shame, fear,  
28 fear of harm and fear that they would not be believed.

29 **CHAIR:** Yes.

30 **MS McKECHNIE:** And there are, of course, the distinct and particular vulnerabilities of these  
31 children, they are different from each other, Marylands as against Hebron. At Marylands  
32 the children often had learning disabilities, lacked family support, some had no families or  
33 dysfunctional families. The children at Hebron were in the care of Hebron because they  
34 were at the edges of society and had found themselves on the streets.

1           Finally, there are clearly systemic failings by regulators, social workers and church  
2 authorities which led to insufficient and incomplete investigation of complaints or  
3 complaints not being followed up.

4           Commissioners, the survivor evidence is clear that the children, many of the  
5 children at Marylands and at Hebron were part of a dysfunctional system of care that  
6 ultimately allowed abuse to take place and the Church takes responsibility for its part of  
7 that system.

8           The safeguarding processes within the Church during the Marylands period were  
9 rudimentary and insufficient. The evidence of Brother Tim is that within The Order during  
10 this period complaints were first brought to the Prior of the community, and what is now  
11 clear from the record is that for periods in the history of Marylands, the Prior himself was  
12 an abuser.

13           Brother Tim accepted, Madam Chair, when you put it to him in evidence, that the  
14 evidence supports that there was a culture of systemic abuse for periods at Marylands and  
15 the wider Church shares Brother Tim's shame that that was the case.

16           Commissioners, it is clear from the historical records such that we have that  
17 opportunities to prevent harm were missed. In 1977 an anonymous complaint was made by  
18 an adult about Bernard McGrath and Rodger Moloney in a letter that did not name the  
19 children alleged to have been harmed and it did not detail the behaviour. Tragically, very  
20 tragically in hindsight, Brother O'Donnell did not believe this allegation.

21           The assumptions that he made about those letters, the motivations, the assumptions  
22 he made about the motivations for sending the letter, and his decisions to destroy them  
23 would not have the been made today. In 2003 during the second Police investigation when  
24 the full extent of Bernard McGrath's offending was becoming clear, Brother Moloney was  
25 interviewed on a number of occasions and in one of those interviews he acknowledges that  
26 he should not have dismissed the 1977 allegation.

27           Both Brother Tim and Archbishop Paul have expressed their deep regret about some  
28 of these decisions of their predecessors.

29           Commissioners, there does remain some debate about what the historical record  
30 shows about who knew what within the leadership of The Order and within the wider  
31 church and when they knew that. We will detail what this historical record shows and what  
32 inferences can be drawn from it in our formal written submissions.

33           From the records we have, the actions of the leadership, The Order's leadership in  
34 August 1992, when the allegations against McGrath were being made, suggest the

1 leadership were not seeking to cover up his offending. I note that's not the conclusion of  
2 the journalist in the documentary we have just seen, but we will detail what inferences we  
3 say can be drawn from those documents. He, of course, was returned to face prosecution in  
4 1993.

5 For the diocese, Commissioners, we are not aware of any records that show that the  
6 Bishop of Christchurch was aware of allegations against McGrath prior to 1992. The  
7 diocesan records show that they have knowledge of those allegations against McGrath  
8 when they were raised in the context of Hebron in 1992. And the first complaint made  
9 directly to a Bishop in New Zealand appears to have been after these prosecutions became  
10 public.

11 It is not clear, Commissioners, from the historical record beyond the evidence from  
12 the Detective Superintendent why further steps were not taken in 1993 to examine the  
13 extent of offending.

14 **CHAIR:** It became pretty clear through the evidence that much of the reason why it's so difficult  
15 to pin down who knew what was the lack of documentary evidence, isn't it.

16 **MS McKECHNIE:** Yes ma'am. And, as I go on to say in those submissions, what the historical  
17 records do amply demonstrate is first that the record-keeping was not good. And  
18 record-keeping was not only not good, but that records of allegations were not kept.  
19 Brother O'Donnell acknowledged in 2016 his practice was not to record these matters. And  
20 Commissioners, this lack of knowledge also meant that between generations of leaders  
21 within The Order, there was a lack of knowledge of what had gone before. And tragically  
22 this has created risks that patterns of behaviour and warning signs were not known.

23 It is clear from some of the correspondence from Brother Burke and then again the  
24 early period of Brother Timothy that they are not aware of matters that their forebears  
25 knew, and it's only become clear to them when, for example, Police statements from the  
26 2000s have been given to the Brothers. These documents have not allowed that knowledge  
27 and those warning signs to have been identified.

28 **CHAIR:** Yes.

29 **MS McKECHNIE:** And that is very tragic, Commissioners, and it has allowed abuse to go  
30 undetected for longer than it should have.

31 **CHAIR:** Is it accepted by the Church that this is another systemic failing, this failure to keep  
32 reports and details of complaints? Because I see the Church has said it's changed, it's now  
33 taking steps to do it, it's obvious that it was needed but it wasn't done, was it, and it wasn't  
34 done --

1 **MS McKECHNIE:** Commissioner, I am reluctant to make a comment on behalf of the whole  
2 Church because the documents that we hold for other Orders and different congregations  
3 are different, and for other diocese and congregations the record keeping is better.

4 **CHAIR:** Let's keep it to St John of God.

5 **MS McKECHNIE:** No, for St John of God, ma'am, I think Brother O'Donnell's words in 2016  
6 acknowledge that that's his practice and that has created problems.

7 **CHAIR:** Yes, all right thank you.

8 **MS McKECHNIE:** Commissioners, picking up on those comments that you just made, Madam  
9 Chair, the Church is very aware of these failings and since 1990 has collectively  
10 implemented and followed A Path to Healing about which you have heard much evidence  
11 in the past.

12 There are now additional processes around abuse and around safeguarding.

13 For many it has not changed enough and the church acknowledges that and this  
14 Royal Commission will go some way to installing further change. There is clearly still  
15 work to do.

16 **CHAIR:** Yes.

17 **MS McKECHNIE:** Commissioners, turning now to the evidence of redress that the Commission  
18 has heard in the last week, and this is clearly very powerful evidence and very valuable  
19 when we look forward to what the redress should be into the future. Commissioners,  
20 I highlighted in opening a number of questions that we were hoping would be explored this  
21 week and many of them have been touched on, and I summarise here some of the evidence  
22 that we have heard and raise the questions and challenges from the Church's perspective for  
23 your input and guidance.

24 Firstly, Commissioners, as I've highlighted for those following, this is from  
25 paragraph 28 of the skeleton, what form should support and redress take? The evidence  
26 this week, Commissioners, and what is clear from the historical record, is that some  
27 survivors have sought a closer and supportive relationship with The Order. There has been  
28 much evidence about what Brother Burke discussed with a number of these men, and then  
29 evidence that those survivors later felt let down. Dr Mulvihill describes this as a second  
30 injury.

31 There are other survivors who have a deep mistrust of The Order and of the Church  
32 and we've heard evidence from Brother Tim that these survivors often want no on-going  
33 relationship with the Church at all.

1           For others, what they want from The Order and/or from the Church changes as they  
2 progress through their lives. Against this, Commissioners, there's clearly a call for  
3 consistency. There's evidence in this hearing where survivors are comparing the  
4 settlements that they receive with the settlements that others received. And these tensions,  
5 Commissioners, make implementing a fair, flexible and effective model of redress very  
6 challenging.

7           These men are all individuals, Commissioners, and how those principles can be  
8 applied in all those circumstances is a challenge that we face and that this Commission  
9 faces.

10 **CHAIR:** Can I just make an observation here, and it comes out of our Puretumu report, as well as  
11 listening further to what we've heard here. I think you've said it; every one of the survivors  
12 is an individual. So to the extent possible, each response for redress must be individualised.

13           That doesn't mean to say that everybody gets the same amount of money, because if  
14 it's dealt with on need then it becomes able to be regulated. But you say that it makes it  
15 very challenging. My suggestion for the Church is to think about it from the survivor  
16 perspective. If a survivor wishes to have further contact with the Church, if it wants to take  
17 advantage of pastoral care, then why not; if they don't, then there will be an alternative.

18           I just wonder how challenging that actually is. It's certainly not cookie cutter.

19 **MS McKECHNIE:** No, ma'am, I think one of the principal challenges is how things change over  
20 time for the church. You speak of decisions which survivors and their legal advisors make.  
21 But subsequently those decisions may be regretted or revisited in what is thought has  
22 changed. That is one of the challenges; the psychological impact of this harm,  
23 Commissioner, makes clear, that survivors, some survivors do change across their lives  
24 what they need.

25 **CHAIR:** That was the magic of Brother Burke's method, I think, because he promised an ongoing  
26 relationship which recognised the changes and recognised the flexibility. So I'm just  
27 putting it there, it was an idea perhaps before its time, but in many ways reflected in our  
28 report.

29           So what I just want to put out there is whatever comes up is not going to be easy,  
30 but we're not in this for being easy, we're in this to make sure that survivors get the full  
31 redress that they need rather than what State or the churches are prepared to give them.

32           I think that takes a mental -- a change, a change in attitude, a change in culture, a  
33 change in way of thinking that is vital before we can get this right. And I'm simply laying  
34 that on the table as thoughts for you and your clients to think about.

1 **MS McKECHNIE:** They certainly are thinking very hard about these issues, Commissioner.

2 **CHAIR:** Thank you.

3 **MS McKECHNIE:** The next element that I set out in my skeleton, Commissioners, is the  
4 vulnerability of survivors through the redress process and that was clear in evidence in the  
5 last week. Some survivors have given evidence about their recollections of the redress  
6 process and the understandings of what occurred, which are not in fact from the  
7 documentary record what occurred.

8 One survivor was very distressed that he had not received an apology when in fact  
9 the records show that he had but did not recall. We have taken steps to re-provide that  
10 document to him. But it demonstrates how difficult these processes can be. Other  
11 survivors don't have the same understanding of the processes that The Order did, and these  
12 led to raised expectations, then confusion, and in some cases the evidence is clear,  
13 significant and understandable anger.

14 You spoke before, Commissioner, about Peter Burke's process. Peter isn't here to  
15 ask, but if you look at the documents and the letters he wrote at the time, Commissioner,  
16 they are not as fulsome as perhaps the impressions he gave to the survivors. Those letters  
17 are more conclusory, allowing that no final settlement document was signed off than  
18 perhaps the impression that was created. That is one of the challenges of the process, that  
19 people have different understandings about what is being discussed.

20 And there is also clearly a question of how to keep survivors safe as they engage in  
21 this process, and that is of vital interest to the Church looking forward to the redresses  
22 processes that you have and will make recommendations about.

23 There's also a question, Commissioners, about how best to provide financial redress.  
24 There was extensive evidence at this hearing about the ineffectiveness of financial redress.  
25 And it's striking, Commissioners, because the redress paid by the Brothers to these men is  
26 the largest redress paid of any institution or organisation in New Zealand.

27 Dr Mulvihill spoke of that dilemma in her evidence about how to ensure on the one  
28 hand payments made to survivors are delivered in the best way possible, that balance  
29 between ensuring individuals have autonomy and freedom to use the monetary  
30 compensation in a manner they see fit, and then also balancing the desire that redress can  
31 be used in an effective way to provide long-term support for those individuals.

32 Many witnesses, Commissioners, gave quite rueful evidence about how they'd  
33 chosen to spend their money, and in many cases there was little, if any, of it left.

1           Commissioners, you've heard evidence in other hearings, and indeed in the Wade  
2 case study in your redress report, Commissioners, which sets out some of the difficulties  
3 and misunderstandings when individuals try to help survivors in how they should spend  
4 their money and how those can be so easily misunderstood.

5           That brings me, Commissioners, to the final point that I highlight in this part of the  
6 skeleton, the lack of trust.

7           It's clear from the evidence, Commissioners, and understandable from the evidence,  
8 that the harm that has been caused to these individuals, the abuse they suffered and any  
9 secondary injuries, has caused them to lose faith in institutions such as the Church.

10          The destruction of that faith then extends to other institutions, such as concerns that  
11 the Police are being controlled by the Catholic Church and it impacts on society and  
12 Church's efforts to improve. And this is a real challenge.

13          The Church acknowledges, Commissioners, that the trust of these people has been  
14 fractured by the action, of the Church, and that rebuilding it will take generations. But that  
15 this work should start now.

16          Commissioners, the Church is encouraging you to consider external measures for  
17 the Church and other institutions. This will assist the Church in demonstrating progress to  
18 survivors in a way that is independent and genuine. The Church is aware that they do not  
19 have and do not deserve, at the moment, the trust of these individuals. So a system that is  
20 clear and can be independently verified will give comfort to those individuals.

21 **CHAIR:** Is that what you mean by "external measures"? I'm not sure what you mean by "external  
22 measures".

23 **MS McKECHNIE:** That is what I mean by "external measures", Commissioner, but the exact  
24 content of those measures, the Church would like to work collaboratively with the  
25 Commission. Those measures themselves are challenging to frame how you would do that.

26 **CHAIR:** Yes.

27 **MS McKECHNIE:** We have no immediate and easy answers for what those measures might be,  
28 but the Church acknowledges the power of the independent auditing and measuring of  
29 those processes to help build trust with survivors.

30 **CHAIR:** I don't know if you have instructions on this, but does it go so far as to embrace the  
31 notion of a completely independent system of redress that sits alongside the State system as  
32 well? Is that something that's within the purview of the Church at this stage?

1 **MS McKECHNIE:** Commissioners, you've previously heard evidence from Cardinal Dew that  
2 the church leaders support an independent redress scheme. So to answer your question,  
3 yes.

4 **CHAIR:** Answer is yes, okay.

5 **MS McKECHNIE:** The details of it, Commissioners, are still to be engaged with and as I'll come  
6 on to, there is a Mixed Commission meeting next week where your redress report and this  
7 hearing are being considered by the Church leaders.

8 **CHAIR:** That's good to hear, thank you.

9 **COMMISSIONER ALOFIVAE:** Ms McKechnie, can I just follow-up on that. So in this context  
10 of Marylands which is education, when you talk about external measures, so we know that  
11 The Order is literally diminishing, they have no further operations. But the wider church  
12 will be still operating in a range of schools, Catholic schools.

13 I'm just wanting to get clarity, when you talk about "external measures", is it about  
14 taking the learnings of what occurred in Marylands and setting up a framework that would  
15 then be applicable across Catholic schools?

16 **MS McKECHNIE:** What I'm referring to here, Commissioner, is in the context of the redress  
17 process. Catholic education, Catholic schools now are in fact State-integrated schools, so  
18 they are subject to the State's regulatory regimes now. The role of Catholic entities in those  
19 bodies is much more limited. They own the buildings and they have a proprietor board, but  
20 the actual appointment of the teachers, the curriculum, what is taught in the schools is  
21 almost exclusively controlled by the State. So it's very different to a Catholic private  
22 school, as Marylands was.

23 **COMMISSIONER ALOFIVAE:** It still brings us back, though, to the issue of the power of the  
24 survivor voice and when young people are able and feeling safe to be able to make  
25 disclosures in these particular types of settings.

26 **MS McKECHNIE:** Very much, and the Church wants to participate in any changes made in the  
27 wider education system in New Zealand. There are very many Catholic schools, as you  
28 will appreciate, Commissioner, and they are a significant part of that wider State education  
29 provision; so any changes that are made to enable children to more easily make complaints  
30 in an education context would be supported.

31 **COMMISSIONER ALOFIVAE:** Thank you.

32 **MS McKECHNIE:** Looking forward, Commissioners. Much of this hearing has rightfully and  
33 properly focused on what has happened in the past and the lessons that can be drawn from  
34 the evidence. But the Church now seeks to move its focus to looking forward and

1 determining the lessons that can be taken from this hearing and how they can be applied to  
2 the modern Catholic Church, particularly with regards to safeguarding and the creation of a  
3 system of redress which seeks to heal from harm.

4 As I mentioned, Madam Chair, the Mixed Commission meeting is being held next  
5 week. This is a meeting of the Bishops of the Diocese of New Zealand and the  
6 congregational leaders. It's a combined meeting and they will be discussing this hearing  
7 and reflecting on the key lessons in these statements and in your reports.

8 The leaders are deeply concerned that the work of the Royal Commission translates  
9 into concrete actions that they can take within the Church as a result of this work.

10 **CHAIR:** This is a meeting called specifically to deal with these issues, it's not a general meeting?

11 **MS McKECHNIE:** No, Commissioner, I don't want to give the wrong impression, this is a -- it  
12 may be annual, six-monthly meeting, but it is the dominant matter on the agenda.

13 **CHAIR:** All right, thank you.

14 **MS McKECHNIE:** The Church has steps underway, Commissioners, there is a road map that has  
15 been discussed and agreed, and these key moments, your report, this hearing, solidify these  
16 actions in concrete ways.

17 Commissioners, I then note in my submissions that we will be filing further  
18 evidence from Brother Timothy to respond to some of the matters in Dr Mulvihill's  
19 evidence. There are some other matters where the documentary record has documents  
20 which we wish to bring to the Commissioners' attention.

21 You will appreciate, Commissioners, there are many, many hundreds of documents  
22 that have been provided to the Commission under notices, from The Order and from other  
23 Catholic entities within New Zealand. There are some difficulties with the records, in part  
24 because there are allegations in Australia, and it is the case that sometimes documents are  
25 found in places that they were not initially looked for because they were not anticipated to  
26 be there. And that has led to some of the difficulties you've heard in the last week in terms  
27 of provision of documents.

28 **CHAIR:** Yes.

29 **MS McKECHNIE:** Commissioners, the Church is not seeking to challenge the stories or the  
30 evidence of the survivors. But where we hold additional information that survivors don't  
31 have access to, we are able to provide that to assist their understanding of their own journey  
32 and their own processes. And it's clear that that record being in the hands of survivors is  
33 very important --

34 **CHAIR:** Yes.

1 **MS McKECHNIE:** -- for them. We have done this informally during Counsel Assisting this  
2 week where we felt it could assist, and there will be some facts and figures that may have  
3 been inconsistent and we will help the Inquiry ensure this information is updated by the  
4 time of its report.

5 **CHAIR:** That's important, because, as I'll make it plain later, the investigation continues, this  
6 hearing is but one part of it. And so we continue to investigate and inquire and any further  
7 assistance is gratefully received.

8 **MS McKECHNIE:** To conclude, Commissioners, as we conclude this part of the Royal  
9 Commission, the Church acknowledges the work of the Commissioners and their staff,  
10 bringing us together in the toughest of times. I'm very pleased personally we have got to  
11 the end of the hearing without anyone having to go into isolation.

12 But on a more serious note, Commissioners, the Catholic Church will continue to  
13 engage with and work with you, the Royal Commission, the Crown, and other faith-based  
14 groups towards a just resolution for survivors of harm in New Zealand. Of critical  
15 importance is a desire to work with survivors and their advocates on this path.

16 The Church acknowledges we need more. Much evidence this week has been about  
17 what best practice was or should have been in the past, and now we need to work  
18 collaboratively to what best practice should be in the future.

19 None of us knows presently exactly what that will look like. Our society and the  
20 Church, as part of that society, needs to get to a better place, which requires expertise,  
21 knowledge, wisdom and experience from all in this room and from all who are listening  
22 either now or later.

23 To close, we ask that survivors, Church leaders, the State, advocates and  
24 professionals join together and collaboratively determine what the best practice should be  
25 for now and into the future.

26 **CHAIR:** Thank you.

27 **COMMISSIONER ALOFIVAE:** Probably lots of questions, Ms McKechnie, but nothing further  
28 given that you're actually going to be filing fuller submissions, and I think you've heard  
29 where our interest points are in the sense that it really is around the accountability of the  
30 leadership and what actually truly went on in that space. So from your perspective and in  
31 respect of the evidence that's before the Commission, so thank you very much.

32 **CHAIR:** Thank you so much, Ms McKechnie, today and for your participation over the last seven  
33 days.

34 **MS McKECHNIE:** Thank you Commissioners.

1 **CHAIR:** We now call on SNAP. I believe --

2 **MS ANDERSON:** Yes, SNAP's counsel is coming in by AVL.

3 **MS OOSTERHOOF:** Yes, Madam Chair, today Ms Marsland will be introducing SNAP to you.

4 **MS MARSLAND:** Tēnā koutou katoa, Ms Marsland for SNAP, I'll be presenting the introduction  
5 to the closing submissions on behalf of SNAP Aotearoa.

6 **CHAIR:** Thank you.

7